

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**DECLARATION OF ELIZA M. REYES IN SUPPORT OF
FIRST INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT
OF FEES AND EXPENSES INCURRED BY RICHMAN & RICHMAN LLC
FOR THE PERIOD OF APRIL 10, 2024 THROUGH AUGUST 31, 2024**

I, Eliza M. Reyes, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the law firm of Richman & Richman LLC (“**R&R**” or the “**Firm**”), with its office located at 122 W. Washington Ave., Suite 850, Madison, Wisconsin, 53703.

2. I submit this declaration in support of the First Interim Application for Allowance and Payment of Fees and Expenses Incurred by Richman & Richman LLC for the Period April 9, 2024 through August 31, 2024 (the “**R&R Interim Application**”), filed on October 3, 2024 [Doc 251], and to correct the average hourly rate listed for one the Firm’s professionals who provided services to Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**WMH**” or “**Debtor**”), during the fee period of April 9, 2024 through August 31, 2024 (“**Fee Period**”).

3. In the Interim Application, the Average Hourly Rate for Attorney Kayla Holmes was listed as \$293.12. See R&R Interim Application, ¶ 17, p. 7. The correct

Average Hourly Rate for Attorney Kayla Holmes is **\$260.29**, as shown in the amended table below.

Timekeeper Name	Position	Hours Worked	Total Billed	Average Hourly Rate
Michael P. Richman	Member	176.6	\$130,875.00	\$741.08
Claire Ann Richman	Member	19	\$10,925.00	\$575.00
Eliza M. Reyes	Senior Associate	187.3	\$84,285.00	\$450.00
James Soo	Associate	35.3	\$9,467.50	\$268.20
Kayla Holmes	Associate	91.4	\$23,791.00	\$293.12 \$260.29
David T. Fowle	Paralegal	67.3	\$13,123.50	\$195.00
Christopher Lawson	Law Clerk	45.6	\$7,980.00	\$175.00

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in the City of Madison, County of Dane, Wisconsin, this 14th day of October, 2024.


Eliza M. Reyes